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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA (Las Vegas)**

Brian K. Schaefer, Jr.,  
Plaintiff,

vs.

Wells Fargo, N.A.,  
Defendant.

Case No.: 2:23-cv-01333-JCM-VCF

**CONSENT MOTION AND ~~PROPOSED~~  
ORDER TO EXTEND THE DEADLINE FOR  
WELLS FARGO, N.A. TO RESPOND TO THE  
COMPLAINT (FIRST REQUEST)**

Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada Defendant Wells Fargo, N.A. ("Wells Fargo"), by its attorneys, hereby submits this Consent Motion for an extension of the deadline to respond to Plaintiff Brian K. Schaefer, Jr.'s ("Plaintiff") Complaint. In Support thereof, Wells Fargo states as follows:

1. Plaintiff filed his Complaint on August 28, 2023.
2. Wells Fargo was served on September 1, 2023, and Wells Fargo's response is due on September 22, 2023.
3. Wells Fargo seeks a fourteen (14) day extension of as the undersigned counsel was recently retained and needs additional time to review the allegations in the Complaint.
4. This is Wells Fargo's first request for extension.
5. Wells Fargo seeks an extension in good faith and not to cause an unnecessary delay.

6. The requested extension will not prejudice any party and is in the interest of judicial economy.

7. Plaintiff consents to Wells Fargo's request for an extension.

In consideration of the foregoing, and for good cause shown, Defendant Wells Fargo Bank, N.A. respectfully requests that the Court extend the deadline for Wells Fargo to file its answer or otherwise respond to Plaintiff's Complaint up to and including October 6, 2023.

Dated this 20th day of September 2023.

**TROUTMAN PEPPER HAMILTON SANDERS LLP**

/s/ Brody R. Wight

Brody R. Wight, Esq.

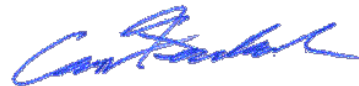
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Attorney for Wells Fargo Bank, N.A.,

IT IS SO ORDERED.



Cam Ferenbach

United States Magistrate Judge

DATED September 21, 2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20<sup>th</sup> day of September, 2023, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND THE DEADLINE FOR WELLS FARGO, N.A. TO RESPOND TO THE COMPLAINT (FIRST REQUEST)** in the following manner:

☒ **(ELECTRONIC SERVICE)** Pursuant to Administrative Order 14-2, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List as follows:

Michael Yancey III, Esq.      myancey@consumerattorneys.com

☐ **(UNITED STATES MAIL)** By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on the date above written: N/A

☐ **(PERSONAL SERVICE)** By causing to be personally delivered a copy of the above-referenced document to the person(s) listed below: N/A

☐ **(EMAIL)** By emailing a true and correct copy of the above-referenced document to the person(s) listed below: N/A

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

/s/ Carla Llarena

An employee of TROUTMAN PEPPER  
HAMILTON SANDERS, LLP